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July 5, 1988

SFUND RECORDS CTR
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Jennifer Decker
U.S. Environmental Protection Agency
Region IX (T-4-3)
215 Fremont Street
San Francisco, California 94105

RE: Atlas Asbestos Company T-4-3

Dear Mrs. Decker:

In responding to the request for information, I have interviewed Mr. Irving Moore, former President of Wheeler Properties (now defunct) on a number of occasions. As we discussed by phone, Mr. Moore had a series of medical problems which affects his ability to communicate with you directly. I have been advised that his medical records from the Reno Veteran's Administration have been forwarded directly to you.

The information I have been able to obtain so far is the following:

OPERATIONS

1. Locations

All mining and milling Mr. Moore participated in was performed at the 140 acre site mentioned in lines 6 and 7 in Paragraph 1 of EPA letter to him dated May 12, 1988. The area has not been surveyed so there are no Section, Township and Range designations.

2. Operating Schedule

Wheeler Properties mined sufficient fiber to keep the mill operating and this in turn was determined by the orders received. Usually they were received on a monthly basis, e.g., GAF wants so many tons this month at their Houston plant, etc.

Generally mining (including stripping and site preparation) was done on day shift 5 days a week. This included equipment repairs, which were handled by the contractor, Robert "Bob" Spoo. Milling was performed 24 hours per day (3 shifts) 5 days per week. The contractor had little trouble keeping a mill surge pile ahead of the mill feed requirements except in very wet winter weather.

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dissolvable. In other words the asbestos, bag and all, could be thrown into the product mix without opening the bag. The rail road began making noises about abandoning freight service to Coalinga. Due to the high bag breakage involved because of splintered car interiors and the rough ride involved ("Cushion air" cars did not reach Coalinga) Wheeler Properties began seeking other methods of shipping the product. Ultimately, it amounted to shutting down the Coalinga, warehouse entirely.

The final step taken to reduce breakage was to wrap the entire pallet load in several layers of plastic before it was shipped from the mill area.

All the shipping containers (i.e. semi-trailers) were loaded at the warehouse dock site at the mill. The handling from there depended on the final destination of the trailer. Those going to the east coast or overseas were hauled to the Sealand terminal in Los Angeles or Oakland. Between twenty to thirty trailers would be placed on a ship and delivered intact on a given date. For medium distances, domestic, the trailer would be hauled to Fresno and put aboard a railroad flat car. It would be shipped "piggy-back" and again delivered intact. Finally, West Coast destinations were loaded and shipped directly from the mill warehouse loading dock mill site. Coalinga was only used as an area in which to store the trailers while waiting to change the mountain tractor/driver for an over the road tractor/driver. The covered trailer or van was not opened.

DRAINAGE CHANNELS

The mining and milling were dry and there was no water used in the production methods. However, during rainy seasons, mostly in the winters, natural drainage, even flooding, did occur, following the normal topographic and geographic land patterns as shown in standard U.S.G.S. topographic quadrangles.

STORAGE AND STOCKPILING

All asbestos storage was confined to the sites mentioned.

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PERSONNEL

1. Personal Vehicles

Personal vehicles were allowed on the mine mill site. However, a bus was provided for employees from Coalinga to the mill site each shift for those who wished to use it, and most of the employees used the bus. The bus drivers had an approved state chauffeur's license and were paid for driving.

2. Parking Lot

A personal parking lot was provided at the mill for employees and visitors.

3. Clothing, Change Areas & Lockers

Two lockers were provided for each employee to change clothes, one to be used for clean apparel, and the other to be used for the dirty laundry. Shower facilities were provided. Long white coats or uniforms were used by the employees. These and other work clothes were generally kept at the mill site; were taken weekly for cleaning and washing by a commercial laundry. Fresh work clothes were issued weekly. All personnel wore hard hats.

No particular clothing was used by the employees. However, the work clothes were generally kept at the site, and the workers took the clothing home only for cleaning. Although Wheeler Properties had the clothes provided by them commercially laundered, some workers used their own clothing, and it would be taken to the worker's home to be washed.

4. Respirators

Government approved Respirators were available to each employee and required to be worn in certain mill areas. Mr. Moore attempted to implement programs to discourage employees from smoking, particularly on the job, but was advised by the Union and by California officials that he could not discriminate against smokers or prohibit smoking on the job, and any attempt to do so was a violation of law. Later, no smoking on the job was approved by the State of California and was encouraged.

5. Emergency Procedures

Wheeler Properties implemented the approved and customary

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emergency procedures and discussed the procedures in accordance with U.S. Bureau of Mines, the U.S. Environmental Protection Agency, California Division of Mines OSHA, and Cal OSHA instructions. Regular meetings led by OSHA certified instructors were held concerning the same. An Emergency Vehicle was present at the mill site. Arrangements were made for Helicopter evacuation if necessary with a local governmental agency. However, this was never used or needed.

OFFICERS, EMPLOYEES & AGENTS

Bob Spoo of Gerlach, Nevada was the mining contractor. He provided his own crew. Melvin Berlund, of Coalinga, California was the mining and milling foreman. Mr. Moore heard that he presently works for Chevron in Coalinga. Jules LaParirie, of (b) (6) [REDACTED], was corporate vice president and on site supervisor until approximately 1977.

J. D. Crites was the company bookkeeper. Mr. Moore heard that he was in Missouri, but this information is more than ten years old. William Whitner was the salesman until 1976. His son, Doug, happens to live in the same apartment complex Mr. Moore lives in. Unit 47. Mr. Moore's father, W.S. Moore, was Chairman of the Board. He is now dead, but he only came to the mining site once or twice a year during the time Wheeler Properties operated the project.

SITE HISTORY

The mine was operated under Mr. Moore's direction as President of Wheeler Properties, d.b.a. Atlas Asbestos. Wheeler Properties ran the project between 1974 and 1978.

Mr. Moore's understanding is that the plant was opened in 1962 by Atlas Minerals Corporation, of New York City. The claim owner Vinnell Corporation of Alhambra, California, d.b.a. Atlas Asbestos assumed operation in 1966 or 1967 until the property was leased to Wheeler Properties in 1974. Vinnell originally staked the claims and leased them to Atlas. Mr. Moore's contact with Vinnell was their Vice President for Mining and Minerals, Mel Redhead, now deceased (of cancer--heavy smoker). Mr. Moore believes that Mr. Redhead's family resides in the Los Angeles area.

When Wheeler Properties entered bankruptcy in 1978 all the claims and property were returned to the legal owner, Vinnell.

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Following a steady diminishment of the asbestos market during the 1970's, particular those related to asbestos floor tile Wheeler Properties d.b.a. Atlas Asbestos entered Bankruptcy under Chapter 7 in 1978. All assets were liquidated by the Trustee pursuant to Chapter 11, U.S.C. Any and all pertinent financial data prior or subsequent would be held by the appropriate legal owner. Wheeler Properties has not been engaged in any business activity or enterprise in any form since the bankruptcy.

I am also endeavoring to obtain the records from the Bankruptcy Court, which may be of further use to you.

USE OF CHROMIUM

Although Mr. Moore was aware of the chromium mine near Wheeler's asbestos mine site, he states that his company never mined chromium, nor did Wheeler Properties ever explore for the same. He recalls reading a report that chromium had been mined on the site during World War Two and the Korean Conflict.

CONTROL EQUIPMENT

To control dust and ambient fibers, required and suggested equipment was installed and operated including fans, baghouses, and exhaust systems. All functioned inside the mill.

INSURANCE POLICIES

Insurance policies were carried as required by law and in accordance with the terms of the lease. Mr. Moore does not recall what firm was the principal underwriter except that they were from Fresno. Henry Leckman, an Attorney from Coalinga might know, as he was a personal friend of the underwriter. Perhaps the bankruptcy attorney, Michael Mason of Lemoore, California, may also have that information. I have written both to inquire.

FINANCIAL STATEMENTS

Mr. Moore has none of the financial records of Wheeler Properties. Mr. Moore states that he believes that all of the records were turned over to the U.S. Bankruptcy Court in Fresno, California. I am trying to obtain the same from the federal archives, and I will forward those to you, if I am successful in obtaining the pertinent information.

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AFFIDAVIT

As you have indicated in your correspondence with Mr. Moore that time is of the essence, I am responding to you without having completed and submitted the Affidavit stating that the diligent record search has been completed. Mr. Moore and I are endeavoring to complete the same, and I will forward his affidavit to you, upon being satisfied that we have done all we can to comply with your request.

I will look forward to hearing from you soon.

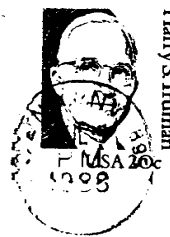
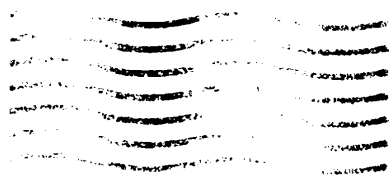
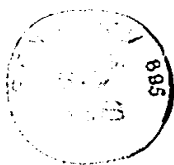
Very truly yours,



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DGB/ras

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